REMARKS

Claims 5-34 are in this application. By this amendment, claims 13-34 have been added. Re-examination, reconsideration and allowance of this application is respectfully requested.

No new matter is added. In particular, support for claims 13 and 31-34 is found in the specification at page 5, lines 6-14 and Fig. 1.

At least some of the support for claims 14, 17, 19, 21, and 27, is found in the specification at page 14, line 13 to page 15, line 21.

At least some of the support for claim 15 is found in the specification at page 10, the paragraph continuing on page 11, at page 5, lines 6-14, and in Fig 1 which shows the provider 13 being separate from the subscriber.

At least some of the support for claims 16, 18, 20, and 28, is found in claims 6 and 7 as previously presented.

At least some of the support for claim 22 is found in the specification at page 10, the paragraph continuing on page 11.

At least some of the support for claim 23 is found in the specification at page 11, lines 31-33, page 13, lines 7-10 and 28-33, and in Figs. 5 and 6 of the drawings.

At least some of the support for claim 24 is found in the specification at page 8, lines 8-16.

At least some of the support for claim 25 is found in the specification at page 14, lines 13-19.

At least some of the support for claims 26 is found in the specification at page 13, lines 12-15 and 23-28, and in claims 5-7 as previously presented.

At least some of the support for claims 29 and 30 is found in the specification at page 5, lines 6-29, page 6, lines 17-27, page 11, lines 4-9, page 12, lines 24-30, and page 13, line 35 to page 14, line 19.

INTERVIEW

Applicant thanks the Examiner for the courtesies provided to Applicant's attorney, the undersigned, and Applicant during an interview on October 31, 2003. During that interview a demonstration was made to the Examiner of the system as claimed in Claims 5 and 15. In that

demonstration, two windows were put up from an active website utilizing the Examiner's computer. In one window there was a document from a database as if it were part of a home document set. Another user was logged onto the same active website in the second window. There was an instruction to modify the document in window 1 which automatically resulted in modification of the document in window 2.

During the interview the examiner questioned whether the formation of a home document set necessitated forming a separate database. It was responded "No." It was noted that the formation of a home document set could be by flagging particular documents in the main document database for use in a particular home document set.

The Examiner also was questioned as to when does the automatic modification step occur. It was responded that the automatic modification step is not limited to any particular order. For example, it was noted that the home document set could be formed with modified documents prior to any request to receive the documents. Alternatively, as shown in the demonstration, modification can be effected "on the fly," i.e., the document is modified as it is being provided to a client.

Attachment A as submitted herewith has been modified from Attachment A in the draft amendment with regard to the order of particular steps in order to show the "on the fly" modification. It should be realized that this is only representative of one embodiment of the claimed invention, and not all embodiments.

During the interview the examiner questioned whether the claims could inadvertently read on a system such as Yahoo where users can customize a home page. It was responded that Yahoo did not appear to modify documents based on the experience of Applicant's attorney. The claims presented here are different from those in the draft amendment to further distinguish the Yahoo system by specifically reciting that the documents after modification are different from the corresponding documents in the main database.

Presented claims differ from those in the draft amendment in that they specify the documents contain text and the text is modified. Such modification can be the addition of text, deletion of text, changing of text, etc. The documents can contain more than text, such as images.

REJECTION UNDER 35 U.S.C. 103

Claims 5-12 were rejected under 35 U.S.C. 103 as being unpatentable over the Legal Anywhere Collaborator reference (LAC herein). It was suggested that LAC teaches maintaining a main document database, registering practitioners, processing document selections of practitioners to identify respective home document sets, identifying requesting users as clients of the practitioners, processing client requests and transmitting requested pages of home document sets to particular clients, maintaining practitioner-specific and client-specific databases and including practitioner-specific and client-specific portions of the database in pages transmitted to clients, maintaining client data and tracking client access to the home document sets. It was further suggested that it would be obvious to have the processing occur from the main document database.

It was additionally suggested that Applicants' arguments previously submitted were not persuasive in that allowance was made for practitioners to have access to documents of other subscribers if so authorized by the other subscribers.

The rejection is respectfully traversed.

ARGUMENT

Comparison of Applicant's Claimed Invention of LAC

To better understand the fundamental differences between Applicant's invention as presented in the claims herein and what is disclosed by LAC, attached as Attachment A is a schematic flow chart showing both Applicant's invention as claimed in, for example, claim 5, and what is disclosed by LAC, as interpreted by the Examiner.

In particular, as recited in claim 5, Applicant's system is designed so multiple independent subscribers can have access to the same document database for their clients and customize the documents for their clients. In particular, a main document database is maintained, where at least some of the documents are obtained from a provider separate from the subscribers (claims 13 and 31-34). This main document database is available for the subscribers for forming their own independent subscriber home document set. The independence of the subscribers is schematically represented by "wall" line 10 in Attachment A. Each subscriber's clients are allowed access to the corresponding home document set. The

text of at least some of the documents in the main document database are automatically modified before delivery to the client. This can occur as the subscriber's home document set is formed, or for example, as shown in Attachment A, this can occur as the documents are transmitted to the clients. The automated modification allows the documents to be customized by the subscriber, such as by stating "this client educational material has been provided to us by Dr. X." (see page 14, lines 15-19 of the specification).

This can be compared with the Legal Anywhere system ("LAC"). As understood from the office action and the Legal Anywhere document, LAC starts with a law firm database. Using this database, attorneys in the law firm can extract their own document set to make it available for a particular client.

The comparison shown in Attachment A reveals the following features present in Applicant's system and not found in LAC:

1. In Applicant's system, the documents provided to the clients are automatically modified. The LAC system does not disclose any such modification, and certainly not any automated modification.

2. In Applicant's system, multiple unrelated subscribers produce their document sets utilizing documents from the main document database. Certainly that is not taught by LAC. A law firm's database can be accessible only by employees of the law firm, to avoid confidential privileged documents in the database becoming available to unrelated third parties, thereby violating the attorney's ethical obligations. The relatedness of the law firm's document set is schematically shown by "enclosure" line 20 in Attachment A, which can be contrasted with "wall" line 10.

With that generic understanding of Applicant's invention as specified in claim 15 as compared to LAC, it is respectfully submitted that each of the claims presented have features which are not taught or suggested by LAC. It is respectfully submitted that no prima facie case of obviousness has been made.

Independent Claims

With regard to claim 5, LAC does not teach having multiple different unrelated subscribing entities to the same main document database. LAC can only allow attorneys from

the same firm to have access to the law firm database to prepare a document set. LAC does not teach or suggest providing multiple unrelated subscribers access to the same main document database. Moreover, LAC does not teach or suggest the automatic modification step (e) of claim 5, or step (c) of claim 15.

With regard to claim 26, there is no teaching of step (d) by LAC, namely modifying at least some of the selected documents prior to receipt thereof by accessing clients.

With regard to claim 29, again there is no teaching or suggestion by LAC of means for automatically modifying the data of the data files prior to receipt thereof by the clients, as specified in step (e).

For the foregoing reasons, all of the presented claims are not rendered obvious by LAC.

Dependent Claims

All of the dependent claims have limitations therein which render them patentable independent of the claims from which they depend. For example, regarding claims 6 and 7, nothing in the LAC reference discloses or suggests insertion of practitioner-specific and/or client-specific information *in pages of home document sets* that are selected from a main document database by practitioners to be accessible by clients of the practitioners. Contrary to the suggestion in the office action, the capability of permitting an outside attorney to access the document does not imply or suggest insertion of any information in pages being transmitted.

Regarding claims 8 and 9, Applicants continue to argue that the term "tracking and storage" in the LAC reference fails to disclose or suggest Applicants' *maintaining client statistics* (claim 8), and it is unclear whether "tracking" in the LAC reference means *tracking client access* (claim 9).

Regarding claims 10 and 31, the office action suggests that "allowing for the law firm to host . . . on our website" as disclosed in the LAC reference is receiving data from a provider as claimed. The law firm as host is not "receiving" data in that the data was already possessed by the firm. There is nothing in the LAC document that suggests the law firm web based database is designed to include provider rather than law firm documents. It is mere speculation to suggest that hosting a web site is the same as claimed by Applicant.

Regarding claims 11 and 12, it is suggested in the office action that since LAC can host websites of different subscribers, and that security and data structures are maintained for different firms, Applicants' claimed navigation paths for subscribers and clients is rendered obvious. This suggestion is also believed misplaced in that Applicants' claimed invention provides the respective client and subscriber navigation paths relative to the same main document database that is accessible by each of the subscribers and, indirectly, by each of the clients.

Regarding claim 13 and 31-33, LAC does not disclose or suggest maintaining a database as a collection from an outside source (or sources), from which subscribers can make available to their clients selected documents.

Regarding claim 14, LAC fails to disclose or suggest dynamic modification of client-accessed documents to include client-specific and/or practitioner-specific data.

With regard to dependent claim 34, there is no teaching of some subscribers being unrelated and being different entities.

Additional Information re LAC

The website referred to the Examiner where the LAC document no longer has any documents. Applicant has found some additional information on the web regarding Legal Anywhere. It appears to Applicant that the additional documents are merely cumulation as comparing what the Examiner already had. Nevertheless, Applicant is attaching hereto all information Applicant has obtained regarding Legal Anywhere for consideration by the Examiner.

In view of the above, it is believed that this application, including each of the claims 1-34, is in condition for allowance. Such allowance is respectfully requested. If for some reason the Examiner considers otherwise, it is respectfully requested that a telephone call be placed to the undersigned so that issuance of a patent can be expedited.

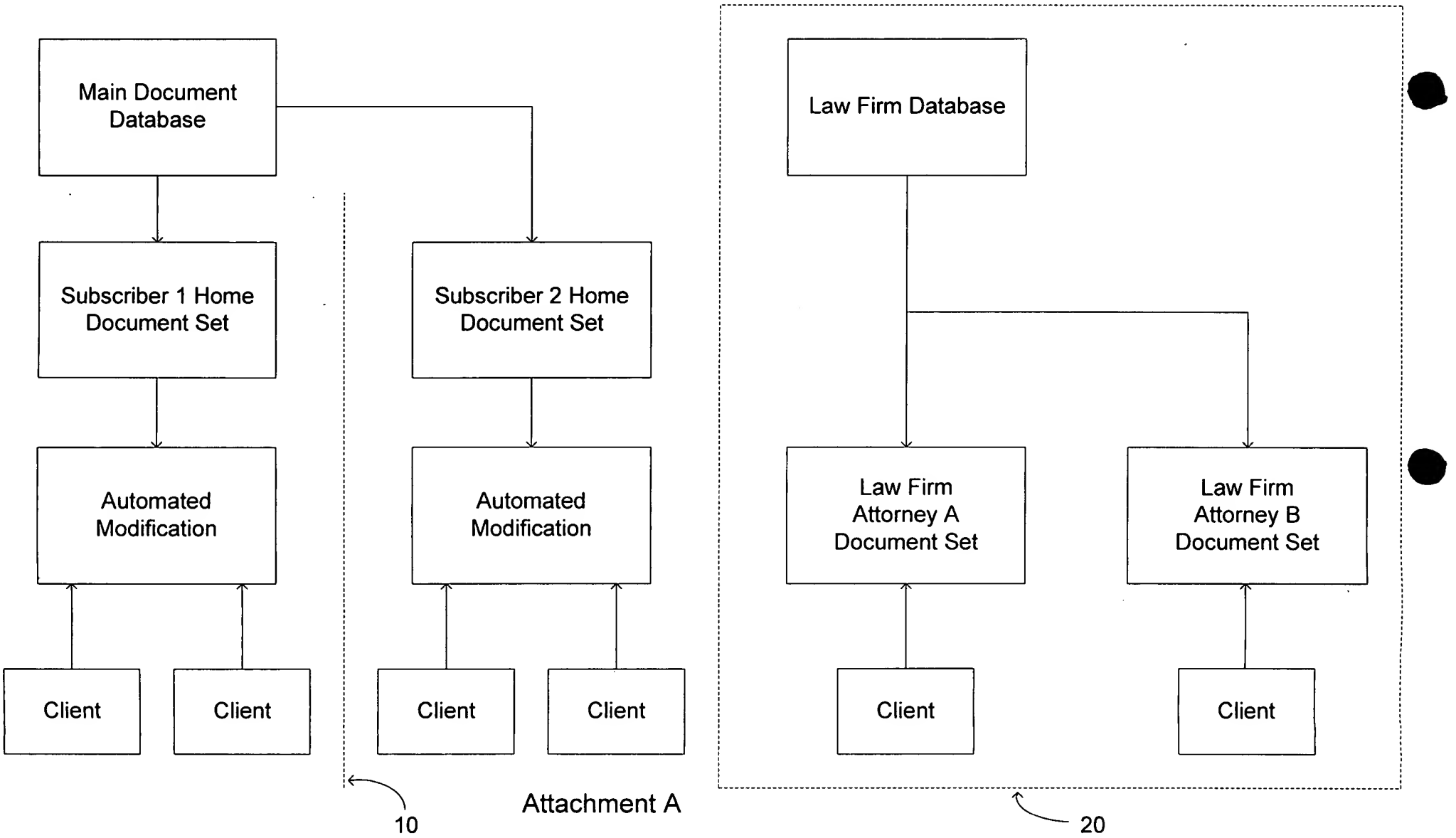
Respectfully submitted,

SHELDON & MAK

Date 11/17/2003

By _____
Jeffrey G. Sheldon
Reg. No. 27,953

SHELDON & MAK
225 South Lake Avenue, 9th Floor
Pasadena, California
(626) 796-4000


Main Document Database
Subscriber 1 Home Document Set
Subscriber 2 Home Document Set
Automated Modification
Automated Modification
Client
Client
Client
Client
10
Attachment A
Law Firm Database
Law Firm Attorney A Document Set
Law Firm Attorney B Document Set
Client
Client
20

AMS Collaborator LLC

Previous Versions

AMS Collaborator 6.1

Scalable, cross-platform, faster performance.

AMS Collaborator 6.1 includes a number of enhancements to provide better performance and easier use. Included in this release is enhanced searching, simpler navigation capabilities, and browser support for Netscape 7.x and Mozilla. Download the **spec sheet** for more information.

AMS Collaborator Enterprise

The Premier AMS Collaborator extranet application.

AMS Collaborator Enterprise (version 6.0) is a complete rebuild of the extranet collaboration software. It incorporates the latest internet technologies including XML, SOAP, and ASP. This version was specifically designed to meet the scalability requirements of larger firms and organizations with a redeveloped menu system, navigation structure, and administration tools. More information about the version can be found in the **spec sheet**.

AMS Collaborator 2002

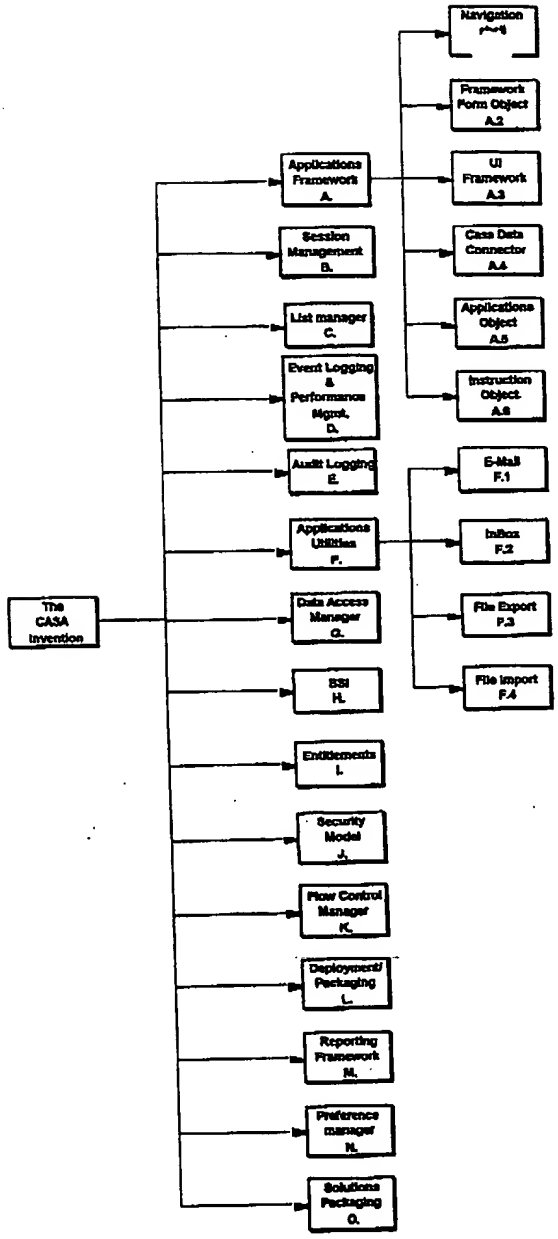
Designed for small to medium companies requiring collaboration and communication services with employees, clients, and partners.

AMS Collaborator 2002 was designed specifically to meet the needs of companies requiring an extranet collaboration tool. The Collaborator provides calendaring, bulletin board, threaded discussion, document management, and voting capabilities in an internet accessible application that is completely customizable to your own company's preferences.

Customizations include the ability to change colors, names, logos, and features in the application to best suit your company's needs, and to match your company's image.

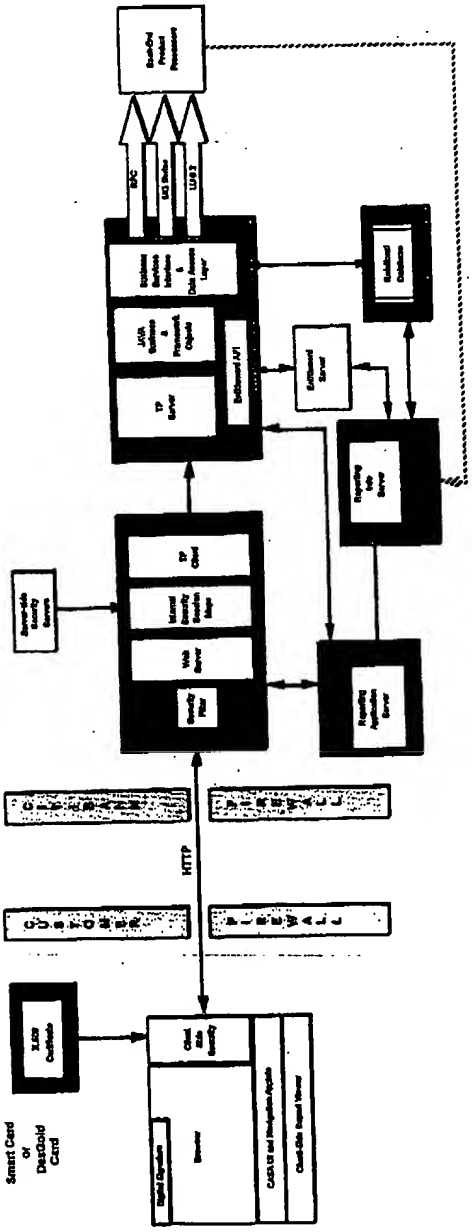
Provisional Patent Application
CUSTO((ACCESS SOLUTIONS ARCHIT((URE

2.0 DRAWINGS


The CASA Invention
Applications Framework A.
Session Management B.
List manager C.
Event Logging & Performance Mgmt. D.
Audit Logging E.
Applications Utilities F.
Data Access Manager G.
BSI H.
Entitlements I.
Security Model J.
Flow Control Manager K.
Deployment/ Packaging L.
Reporting Framework M.
Preference manager N.
Solutions Packaging O.
Navigation
Framework Form Object A.2
UI Framework A.3
Cass Data Connector A.4
Applications Object A.5
Instruction Object A.6
E-Mail F.1
Inbox F.2
File Export F.3
File Import F.4

pg. 13

Customer Access Solutions Architecture
High-Level Architecture



pg. 84

Provisional Patent Application

CUSTO. .R ACCESS SOLUTIONS ARCHIT. TURE

1.0 ABSTRACT OF THE DISCLOSURE

This invention addresses the problem of electronically delivering banking services to end clients and, more particularly, using Internet based technologies as a means of exposing those services. The solution to this problem set forth in this invention is the creation of a common electronic delivery infrastructure and application deployment environment, exposing an institution's entire portfolio of corporate banking services to its clients, anytime, anywhere and anyplace.

Provisional Patent Application
CUSTO. R ACCESS SOLUTIONS ARCHIT. TURE

3.0 FIELD OF THE INVENTION

This invention relates to the field of banking services and, in particular, the field of electronic banking services delivery within the corporate banking arena. More particularly, this invention describes an electronic delivery infrastructure and applications deployment environment supporting direct end-customer personal computer (PC) access to the full range of corporate banking services. More particularly, this infrastructure is designed to be accessed either directly over the Internet, via extranet direct dial-in or via other private network access methods using standard internet technologies.

4.0 BACKGROUND OF THE INVENTION

For the top tier international businesses involved in a global operation, the need for electronic access to financial services is no longer considered a "nice-to-have" but an absolute necessity. Assuming one discounts the operational imperatives to have instantaneous access to consolidated information, the global nature of the world's economies, the inter-dependencies between products and services in one region and another, the price competitiveness between global entities, the sheer growth and trajectory of our information capabilities makes electronic global access to services an axiom. Today's international businesses clearly understand that they have a need to not only be "globally present" but also "globally aware." For institutions, such as international money-center banks, whose business it is to deliver global corporate banking services, an effective and efficient means for electronic delivery is core to their existence.

Developing an effective and efficient means for electronic delivery of corporate banking services has been a challenge for the industry. Over the past twenty-three years, from 1975 to 1998, there have been several efforts at developing electronic banking services. Most have been either single product in orientation, single region and limiting in the technology's ability to meet even basic needs. In the mid 1970's to 1980', many of the systems were based upon the concept of terminal emulation, in the middle 1980's DOS workstations became popular, then in the latter 1980's to early 1990's we went from mainframe CPU-to-CPU communications to Windows Workstations with proprietary software loaded on the end-client's machines. All of these, while delivering some measure of functionality, fell far short of the needs as a platform and infrastructure to keep pace with the business needs. What's worse is that many of these systems still remain today and incur substantial infrastructure, maintenance and support costs associated with their continued use. Traditional prior art computer systems have several deficiencies which are addressed by the present invention:

- High operating costs. Deployment costs are extremely high. Deployment requires site visits by electronic banking teams. Support costs are also high for software installed on customer sites - especially for supporting numerous customer operating environments/LANs.

- Inferior security. Unreliable hardware-based security solutions. Many systems are not compliant with latest corporate security standards.

- Fragmented product delivery. Many customers have multiple systems in their offices. Each system specifically focused on delivery of a single product. Platforms capable of integrating across products are rare at best. xxxxx

- Extensive time to market. Time-to-market is key to competition; one year lead time on new capabilities development. Development process requires integration with full release. Deployment of new services gated by implementation capability (2-3 months lead time and growing).

- High cost to market. Current per site cost deployment/support too high for profitable delivery to new market segments. This is especially true for third-world emerging markets.

- Inflexible infrastructure. Unable to deliver new products (e.g. image delivery) with existing infrastructure.

5.0 SUMMARY OF THE INVENTION

This invention, which is an electronic delivery infrastructure and applications deployment environment, provides for a highly efficient and effective means for exposing an institution's entire portfolio of corporate banking services to its clients, anytime, anywhere and anyplace.

5.1 Issues Addressed

The invention resolves issues presented by prior technology solutions, in that it:

- Lowers operating costs and improves quality. The invention requires no client visits to install and/or upgrade software. Client-side support is eliminated.
- Improves time and cost to market as well as facilitates client acquisition. The invention is network centric and therefore facilitates rapid product development as well as introduction. The structure of the architecture also eliminates release dependencies.
- Increases security and reliability. The invention applies both software and hardware based security.
- Improves competitive positioning. The invention provides a single platform for integrated delivery.

5.2 Broad Features

The invention incorporates the following features:

- Support for multiple access methods depending on customer requirements
- Use of non-proprietary Internet-enabled devices (e.g. Web browsers) accessing business applications
- Direct commercial integration with customer processes and systems
- Global data warehouse for information
- Software-based security for encryption and authentication; hardware-based token cards for user access

- Dial-up or through client networks

5.3 Architectural Components

The above is achieved through the integration and development of a comprehensive infrastructure comprised of the following architectural components:

- Support for rapid applications development in the form of an Applications Framework. This framework incorporates such entities as a Navigation Shell, Form Objects, Data Connector, User Interface Framework, Application and Instruction Objects.
- A Session Manager which manages the life-time of a user session.
- A facility called a List Manager which manages the retrieval of generic list data.
- A facility for providing an abstraction between persisted data and the application called the Data Access Manager.
- A facility which provides an abstraction between product servicing applications and the delivery application. This abstraction is called the Business Services Interface.
- A facility for reporting called the Reporting Framework.
- A Preference Manager which provides support for handling and managing user preferences.
- Infrastructure for Event Handling and Performance Management.
- Robust Audit Logging facilities.
- Facility for managing interchanges between common system components. This facility is called the Flow Control Manager.
- A robust Security Model supporting both hardware and flexible software implementations.
- An Entitlements Manager for controlling user access to sensitive information.
- A facility for packaging and representing products called the Business Services Directory.

- A host of common Application Utilities including InBox support, file import/exports. e-mail and self-publishing.

6.0 BRIEF DESCRIPTION OF THE DRAWINGS

Two sets of drawings have been provided to illustrate the nature and structure of the invention. It should be noted that the invention encompasses several components and is as much unique for the manner in which it has integrated technology as it is for the components themselves. What follows is a brief description.

6.1 Component Illustration

The first diagram (shown on page 3) provides a high-level view of the basic components that comprise the invention. As one can see from the illustration, the Applications Framework is a large portion of the invention. It is the core of the application and is particularly constructed to provide reusable elements that can and should be applied across all applications and products. Another major area that encompasses other key components are the Applications Utilities. Each utility is a major sub-system in its own right which acts to provide common or generic services typically used by applications and thought of from an end-user perspective as stand-alone integration applications.

6.2 Architectural Illustration

The second diagram (shown page 4) provides a high-level view of the basic architectural constructs. In a true client/server nomenclature, it comprises clients which requests or invokes services and servers which respond to invocation or requests. Highlighted are the client workstation components, the Web Server, the Applications Server, the Database Server, Entitlement Server, Reporting Servers as well as interfaces to back-end product processors. The illustration also provides information with respect to the communications methods employed by each component.

7.0 DETAILED DESCRIPTION OF THE PREFERRED EMBODIMENTS

The electronic delivery infrastructure and applications deployment environment disclosed herein provide for highly efficient and effective means for exposing an institution's entire portfolio of corporate banking services to its clients, anytime, anywhere and anyplace.

7.1 Applications Framework

A set of Java classes which enable developers to build an easily integrate business applications on CASA.

7.1.1 Navigation Shell

Java applet that occupies the entire client area of the browser and is the place where business applications forms are displayed and made available. Navigation shell is customizable (selection of solution packages, dynamic re-sizing of the form area, etc.). Supplies an interface for new forms and applications to be inserted, completely data driven.

7.1.2 Form Objects

Created and manipulated by the Nav Shell and are the entry points into the appllication framework.

7.1.3 Data Connector

Network abstraction in CASA that handles the HTTP connection back to the server. Represents a standard form of passing data from the CASA client to the CASA server.

7.1.4 UI Framework

An extension of the CASA Application Framework. Form Panel that automates the transfer of CASA Field Collections from the CASA field collection fields to GUI form fields. In addition to transfer will formalize and standardize valuations on fields, implementations model, view, controller paradigm that utilizes the CASA Field Collection.

7.1.5 Application Object

The Application Object provides the core server-side validation and business logic that controls the application. It also manages and determines the use of the Instruction Object. It is the key representation of the business case.

7.1.6 Instruction Object

The Instruction Object provides for consistent implementation of such areas as workflow, entitlement, persistence, event logging and a standard set of methods such as a modify, verify, authorize, etc.

7.2 Session Manager

Manages user sessions, establishes DCE context for a user (maps the Entrust X.500 identify into a DCE context). Manages the life-time of a user session. Provides the entry point into the Java domain. Session manager is a C++ component that makes a call into the Java session object which is a COM interface.

7.3 List Manager

The List Manager provides a generic means to access information to be presented in a list paradigm. It provides a variety of means with which to present information.

7.4 Data Access Manager

The Data Access Manager is a generic means to abstract the details of the database implementation away from the application. In using this tool, changes can be made to the database (including replacing the database with another) in a manner that can be made transparent to the application.

7.5 Business Systems Interface

The Business Systems Interface is an abstraction of the production application sub-system away from the business application.

7.6 Reporting Framework

The Reporting Framework provides a capability to select, schedule and view reports. The Reporting Framework is both a static and dynamic reporting infrastructure enabling the creation and use of online reports. The facility provides a navigation model to available reports, enforces security model based upon user entitlement, enforces low level data entitlement at the database for table access, provides scheduling capabilities, supports run-time criteria and supports the InBox navigation model.

The Static report support facility uses Crystal Reports designer to define report layout and generate SQL. It also uses the Crystal Info three tier architecture to support scheduling, load balancing, etc.. The facility supports various data output formats (HTML, Crystal.rpt, CSVetc.), supports various delivery mechanisms (E-mail, MailBox etc.) and can be viewed through chunking mechanism for more efficient bandwidth utilization.

The Dynamic Reporting facility allows the full result set of a report query to be delivered to the client. The actual presentation of the result set can be handled by client control. The facility allows the result set to be passed to other client Java applets for charting and other types of graphical reporting needs. Finally, the result set can be stored on the client file system.

7.7 Preference Manager

A framework for handling user and application preferences. New application preference requirements are registered with the preference manager which handles the persistence of preferences, also handles access etc.

7.8 Event Handling & Performance Management

An entire suite of software has been developed to identify and uniformly process error messages. This includes a method by which error strings (i.e. text messages) can be mapped to a particular end-user's language. There are also tools established for measuring and managing performance throughout the network.

7.9 Audit Logging

Audit Logging is a service that is used uniformly by all applications. Every event and key stroke is monitored allowing one the ability to develop very customized and personalized applications targeted to meet the needs of specific clients.

7.10 Flow Control Manager

The Flow Control Manager is a common component of the system which is used by the instruction object and library objects to impose a designated workflow based upon a set of fields sourced from an instruction or library object.

7.11 Security Model

The Security Model incorporates both hardware and software components. Components include the use of DES Gold and Smartcard technologies, X.509 Certificates, Web Crusader with Entrust, Entrust Server components, Firewalls, and specially developed entitlements server (called CitiSafe) and the application of an event logging manager.

7.12 Entitlements Management

Manages creation, update and persistance of the Access Control List.

7.13 Business Services Directory/Solutions Packaging

The Business Services Directory allows businesses to package discrete services into customized solutions to meet client needs.

7.14 Applications Utilities

Several stand-alone common application utilities are also included as part of the comprehensive set of tools:

7.14.1 InBox

The inBox is an alternative navigational model that allows the end-user a single view of the workspace and a way to view pending work, reports that have been run, service messages and other such items.

7.14.2 File Import/Export

File Import provides for two types, In-session File Import and Out-of-session File Import. In-session File Import is supported via a Web browser and delivers information over http. Import collaborates with translation services and instruction/libraries to provide an efficient mechanism for bulk data loads typically originating from another system.

Export supports industry standard output formats to extract customer data out of the invention to feed into an end-client proprietary system.

7.14.3 E-Mail

E-Mail Infrastructure allows client services representatives and other personnel to communicate with clients. It enables pro-active delivery (e.g. confirmation of services, market research, etc.) of critical information.

7.14.4 Self-Publishing

The ability to provide help documents and other marketing information is given via an extensive intra-net self-publishing model (ISPM).